### COUNSEL LISTED ON LAST PAGE



# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION

ZOLTAR SATELLITE ALARM SYSTEMS, INC.,

Case No.: 06cv044 JW

Plaintiff,

STIPULATION AND [PROPOSED] ORDER RESETTING THE SCHEDULE FOR SOME EXCHANGES AND BRIEFING RELATED TO CLAIM CONSTRUCTION

v.

Hon. James Ware

LG ELECTRONICS MOBILE COMMUNICATIONS CO., et al.

Defendants.

Counsel for Plaintiff Zoltar Satellite Alarms Systems, Inc. ("Zoltar") and counsel for Defendant Samsung Electronics Co. LTD and Samsung Telecommunications America LLC (collectively, "Samsung") have agreed to engage in mediation on August 13, 2007.

Zoltar, Samsung, Sprint Corporation (Sprint), and Motorola, Inc. (Motorola) therefore stipulate, agree, and respectfully request the Court to reset deadlines for claim construction exchanges and briefing according to the following schedule, which delays some exchanges and briefing until after the mediation, while leaving undisturbed the Court's previously chosen dates for the conclusion of Claim Construction briefing and the Claim Construction Hearing:

## Case 5:06-cv-00044-JW Document 198 Filed 07/30/07 Page 2 of 4

| August 7, 2007     | Zoltar files Opening Claim Construction Brief based on terms identified with |  |  |
|--------------------|--|--|--|
|                    | Motorola and Sprint.   |  |  |
| August 15, 2007    | Zoltar and Samsung exchange Patent L.R. 4-1 Initial Identification of Claim  |  |  |
|                    | Terms for Construction.  |  |  |
| August 20, 2007    | Zoltar and Samsung exchange Patent L.R. 4-2 Preliminary Claim                |  |  |
|                    | Constructions and Extrinsic Evidence.  |  |  |
| August 22, 2007    | Zoltar and Samsung file Patent L.R. 4-3 Joint Claim Construction and         |  |  |
|                    | Prehearing Statement.  |  |  |
| August 28, 2007    | Samsung, Motorola, and Sprint file Claim Construction Response Briefs.       |  |  |
| September 6, 2007  | Zoltar files Claim Construction Reply Brief.                                 |  |  |
| September 21, 2007 | Claim Construction Hearing.  |  |  |

Zoltar and Defendants jointly request that the Court issue its Order based on the foregoing stipulation.

## IT IS SO STIPULATED:

| DATED: <u>July 23, 2007</u> | WILLIAMS, MORGAN & AMERSON, P.C. GIRARDI & KEESE   |
|-----------------------------|--|
|                             | By: /s/Howard Miller Howard Miller Attorneys for Plaintiff ZOLTAR SATELLITE ALARM SYSTEMS, INC.                                      |
| DATED:July 23, 2007         | JONES DAY  |
|                             | By:/s/ Tharan Gregory Lanier Tharan Gregory Lanier Attorneys for Defendant MOTOROLA INC.   |
| DATED: _July 23, 2007       | ROUSE HENDRICKS GERMAN MAY PC  |
| DATED: <u>July 23, 2007</u> | By:/s/ Larry Rouse Larry Rouse Attorneys for Defendant SPRINT CORPORATION HELLER EHRMAN, LLP   |
|                             | By:/s/ Aaron B. Thacker Aaron B. Thacker Attorneys for Defendant SAMSUNG ELECTRONICS CO. LTD. SAMSUNG TELECOMMUNICATIONS AMERICA LLC |

# **ORDER**

Having considered the foregoing Stipulation, and good cause appearing therefore, it is HEREBY ORDERED that:

The schedule for claim construction shall be as follows:

| August 7, 2007     | Zoltar files Opening Claim Construction Brief based on terms identified with |  |
|--------------------|--|--|
|                    | Motorola and Sprint.   |  |
| August 15, 2007    | Zoltar and Samsung exchange Patent L.R. 4-1 Initial Identification of Claim  |  |
|                    | Terms for Construction.  |  |
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|                    | Prehearing Statement.  |  |
| August 28, 2007    | Samsung, Motorola, and Sprint file Claim Construction Response Briefs.       |  |
| September 6, 2007  | Zoltar files Claim Construction Reply Brief.                                 |  |
| September 21, 2007 | Claim Construction Hearing.  |  |

| DATED: | July 30, 2007 | _   |
|--------|---------------|---|
|        |               | - James Upre                                    |
|        |               | THE HON JAMES WARE UNITED STATES DISTRICT JUDGE |